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MEMO ENDORSED

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November 16, 2022

**VIA ECF**

The Honorable Andrew L. Carter, Jr., U.S.D.J.  
United States District Judge  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: United States of America v. Valeria Ruth HaCohen,**  
**Case No. 1:20-cr-00648-ALC**

Dear Judge Carter:

We represent defendant Valeria Ruth HaCohen in the above-referenced matter. We write, now, in furtherance of our request for permission for Ms. HaCohen to travel to Israel for her son's Bar Mitzvah.

As set forth in the letter application filed on September 30, 2022 (Dkt. No. 80), Ms. HaCohen's son's Bar Mitzvah ceremony will be held next month in Israel. Ms. HaCohen requests permission to travel to Israel to be with her family and share in this deeply meaningful rite of passage of immense personal and religious importance to her.

In further support of our application, we are writing to provide the Court with updated information and documentation regarding the requested travel arrangements. As demonstrated by the enclosed trip itineraries (Exhibits 1 and 2), Ms. HaCohen would depart from Newark for Tel Aviv on December 17, 2022. For her return trip, she would depart from Tel Aviv for Newark on January 9, 2023.

As indicated by the attached invitation (Exhibit 3), Ms. HaCohen's son's Bar Mitzvah is now scheduled for January 5, 2023, when he will be called to read from the Torah. There is also a separate celebration with family, friends, and members of the community in advance of the ceremony, to occur on December 29, 2023. We have conferred with the Office of Pretrial

Services and the U.S. Attorney's Office, and both indicated that they take no position on this application.

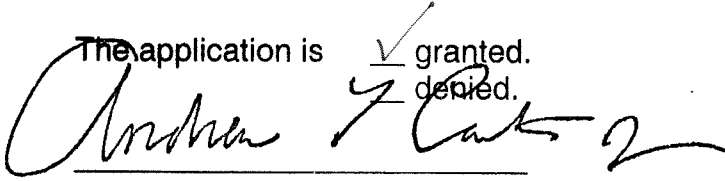
Accordingly, we respectfully request the Court's permission for Ms. HaCohen to travel to Israel for her son's Bar Mitzvah. We are most grateful for the Court's consideration of this request, and are available to answer any questions or discuss this matter with the Court in further detail.

Respectfully submitted,

/s/ Ernest Edward Badway  
Ernest Edward Badway

Enclosure(s)

cc: Michael D. Lockard, Esq. (via ECF)  
Matthew J.C. Hellman, Esq. (via ECF)

The application is ☒ granted.  
☐ denied.  
  
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Andrew L. Carter Jr, U.S.D.J.  
Dated: November 28, 2022  
NY, New York